

### CONCLUSION

After considerable discussion of all eleven solutions, the following conclusions were reached:

There were five potential solutions that the task force agreed would serve as partial solutions to reduce call splashing. They are:

- Elimination of call blocking (#1),
- Consumer education (#4),
- Establishment of billing and collection agreements (#5),
- Establishment of billing validation agreements (#6),
- Call reorigination at CPE (#8).

The task force recognized that call unblocking, while potentially difficult to fully implement, and the provision of consumer information as ordered by the FCC, coupled with consumer education, would significantly contribute to the reduction of call splashing. In addition, call reorigination at the CPE and the establishment of billing and collection and billing validation agreements will further reduce splashing. However, these solutions may require varying lengths of time to implement and may not totally eliminate splashing due to other factors such as:

- 1) state regulatory requirements that callers be connected to preferred OSP without having to redial, and
- 2) notwithstanding the waiver process, some blocking may continue to occur until technical solutions for the prevention of toll fraud are implemented.

There are two potential solutions that the task force agreed were not feasible:

- Call reorigination at LEC switches (#9),
- OSP subcontract (#10).

There are differences of opinion on the four remaining potential solutions as to the feasibility of their implementation. They are:

- Call transfer with signalled ANI (#2),
- Call transfer with oral ANI (#3),
- Establishment of 800/950 access by IXC/OSPs (#7),
- Call transfer with call detail (#11).

Disagreements with respect to feasibility centered on discussion of the following issues:

- 1) magnitude of economic impact,

- 2) impact of required interconnection agreements between competing OSPs,
- 3) implementation timeframes,
- 4) technical complexity, sometimes complicated by unavailability of detailed requirements, and
- 5) the characterization of these solutions as requiring business relationships between competing OSPs versus requiring network interconnection arrangements between competing OSPs.

Task force participants and other industry members may provide individual company positions regarding the contents of this report, including the feasibility of these solutions.

The task force noted that selection of any partial solution should be made in conjunction with some quantitative analysis to determine the level of call splashing that is resolved by the solution.

In order to assist in this analysis effort, the task force will supply to the FCC the results of an OSP industry survey which will attempt to quantify the incidence of call splashing by reason (see attached questionnaire). The results will be provided by June 15, 1989 assuming receipt of relevant information from the industry by June 5, 1989.

## **Appendix A**

### **Organizations Attending Call Splashing Task Force Meetings**

**ABC**  
**Alltel Service Corporation**  
**American Network Exchange, Inc.**  
**Ameritech Services Inc.**  
**AT&T**  
**Bell Atlantic**  
**Bellicore**  
**Bellsouth Services**  
**Call America**  
**Capital Network System, Inc.**  
**Central Telephone Company (CENTEL Corp)**  
**COMPTEL**  
**Contel Corporation**  
**CTI**  
**DSC Communications**  
**Exchange Carriers Standards Association**  
**GTE Services Corporation**  
**Integretel**  
**International Telecharge Inc.**  
**ITT Chernow**  
**Litel**  
**Long Distance USA**  
**MCI**  
**National Data Corp.**  
**National Telephone Services Inc.**  
**Northern Telecom**  
**NYCOM**  
**NYNEX**  
**Operator Assistance Network**  
**Operator Service Providers of America**  
**Pacific Bell**  
**Payline Systems**  
**Southwestern Bell Telephone Company**  
**Sprint Services**  
**Teleconnect\*USA**  
**Telesphere Int.**  
**U S Long Distance, Inc.**  
**U S Sprint**  
**U.S. Telephone Association**  
**U S West**

I.D. Number \_\_\_\_\_

### SURVEY QUESTIONNAIRE

Please refer to definitions and explanations set forth in cover letter.

1. What is your average monthly 0+/0- call volume for completed calls? \_\_\_\_\_

2. Please indicate average monthly completions by reason:

Reason (see explanation below):

Monthly	A	B	C	D	E	F
Number of calls <u>splashed</u> to AT&T	_____	_____	_____	_____	_____	_____
Number of calls <u>transferred</u> to AT&T which result in in correct billing	_____	_____	_____	_____	_____	_____
Number of calls <u>reoriginated</u> using automated dialing equipment	_____	_____	_____	_____	_____	_____
Number of calls turned back for customer to redial	_____	_____	_____	_____	_____	_____

#### Explanation of Reasons:

A -- Caller requests another carrier.

B -- State regulation or legislation prohibits forced redialing or you lack certification in a particular state.

C -- Billing method offered by the caller cannot be processed or is not accepted by you.

D -- You know alternative dialing methods are blocked so that caller will be unable to redial.

**E -- Caller requests a type of service you do not offer,  
e.g., international, busy line verification,  
emergency interrupt.**

**F -- Do not know reason.**

- 3. What is the average monthly number of calls which you  
complete and are unable to bill? \_\_\_\_\_**
- 4. Please indicate if your responses are based on actual or  
estimated numbers. \_\_\_\_\_**

**Data to be provided to FCC based on  
responses to questionnaire:**

Total # OSPs Surveyed	_____
Total # OSPs Responding	_____
o # OSPs Who Splash	_____
o # OSPs Who Don't Splash	_____
Total # Completed Calls	_____
o OSPs Who Splash	_____
o OSPs Who Don't Splash	_____
Total # Completed Calls which cannot be billed	_____

Reproduction of grid with cumulative numbers.

**NY COM Inc.**

Five High Ridge Park, Stamford, Connecticut 06903-1326

2003 322-731

May 22, 1989

Mr. Darryl Brown, CLC Secretary  
CARRIER LIAISON COMMITTEE  
5430 Grosvenor Lane - Suite 200  
Bethesda, Maryland 20814

Dear Mr. Brown:  
Darryl,

This is to provide NYCOM Information Services' comments for inclusion within the Task Force Report on Call Splashing to be sent to the FCC on June 1, 1989.

NYCOM Information Services takes exception to the exclusion of potential solution #10, i.e., OSP Subcontract, from those agreed to as offering a partial solution to reduce call splashing.

NYCOM's position is that removal of #10 from the list of potential solutions was not within the province of the Splashing Task Force as it was done in response to a business argument. AT&T stated that it would force AT&T "to partner" and was, therefore, unacceptable. #10 was removed notwithstanding that consensus had been achieved earlier (AT&T included) that consideration of business issues was not within the scope of the Splashing Task Force. Elsewise, how could consideration be given to forcing the industry to stop splashing and/or blocking and, instead, to offer the traffic to AT&T (10288)? Is this not tantamount to forcing the OSP "to partner"?

Solution #10 provides a single, simple, and complete technical solution to all splashing and/or blocking issues. There are, in fact, OSPs providing this exact service for AT&T today. Simply stated, an OSP, upon customer request or receipt of a call which for any reason that particular OSP can not serve and/or bill, would place that message upon AT&T's toll network while providing the Operator Services as requested by the customer. Branding, rating, and message detail at AT&T rates would be provided.

NYCOM is appreciative of the long hours of work which the Splashing Task Force has spent wrestling with the many complicated issues and understands the pressures which may have played a role in allowing #10 to be excluded. However, the exclusion of #10 is a serious mistake which, if allowed to stand, will deprive the FCC of a full range of choice of technical solutions and the one that NYCOM Information Services believes will best serve the American public, as well as the industry.

Very truly yours,

  
Phil Sundberg  
Director, Market/Product Development

**NYNEX**  
Service Company

May 24, 1989

**RECEIVED**

MAY 25 1989

**ECSA**

Mr. Darryl Brown  
Secretary  
Carrier Liaison Committee  
5430 Grosvenor Lane, Suite 200  
Bethesda, Maryland 20814

Dear Mr. Brown:

In response to your Call Splashing Report mailing of May 19, I am forwarding the following comments on behalf of the NYNEX Companies.

General

NYNEX actively participated in the development of the Report as part of the Call Splashing Task Force. NYNEX feels that the Report is substantively sound and represents a basic foundation for addressing the splashing issue. We support the Report as presently constituted.

Quantification of Problem

One question that troubles us, however, and that posed a dilemma for the framers of the Report, is the prevalence of the splashing problem. Although recognized, defined and analyzed, there has apparently been no effort made to date to quantify the incidence of splashing. Therefore, a questionnaire has been attached to the Report, which may or may not serve to establish accurate benchmark figures.

In the State Task Force Report on the Results of the AOS Survey II (February 15, 1989) compiled by NARUC's Staff Subcommittee on Telecommunications, in Section V, Pg. 5, the Report states: "Only two utilities specifically identified splashing as an area where they had received numerous complaints. The Leaf River Telephone Company indicated that their biggest received complaint was that an AOS would not place a call to the customer's carrier of choice. An unidentified Oregon utility also specified that splashing had been a cause of problems in its area". The Leaf River complaint is not even descriptive of the call splashing problem under discussion but rather appears to describe the refusal of an AOS to provide access to a preferred carrier.

Customer complaints attributable to true call splashing, as defined by the Call Splashing Report, are most probably included in the complaint category addressing excessive rate levels, since the misrating occasioned by true splashing would be the customer irritant, not splashing per se. In any case, the point at issue is that we do not have a clear picture as to the magnitude of the splashing problem.



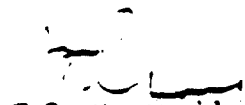
### Correcting the Splashing Problem

Because splashing has not been established as a major problem, it may be prudent to implement the simplest fixes initially and continue to monitor the problem. In no case would it be realistic to prescribe sophisticated and expensive remedies absent quantitative data. Footnote 2 on Pg. 3 of the Call Splashing Report is significant in explaining the inclusion of the Call Blocking condition: "This item was added to the original work plan by the task force after it became clear that the issue of call blocking, while different from call splashing, had to be addressed in order to address completely the call splashing issue". It may well be that the elimination of blocking along with customer education efforts will alleviate the splashing problem for all practical purposes.

### Cost of Correcting the Problem

NYNEX feels that in the interest of fairness any remedial costs involved in eliminating the splashing problem, be they minor or major, should be borne by the cost causers. NYNEX, while fully committed to equal access and intercarrier cooperation, sees no reason why its rate payers should subsidize the business ventures of the Operator Service Providers. In the event that expensive remedies are eventually prescribed the related costs should devolve on those responsible for introducing the disruptive conditions.

Sincerely,

  
J.P. Marshall  
Managing Director

cc: Mr. G. Edwards



236 North Moore Avenue  
Basking Ridge, NJ 07820

May 24, 1989

Mr. George L. Edwards  
Chairman, Carrier Liaison Committee  
5430 Grosvenor Lane  
Suite 200  
Bethesda, Maryland 20814

Dear George:

Attached are AT&T's comments on the Splashing Task Force Report to the CLC and the FCC. We would appreciate it if you would have this document appended to the final report as was discussed both at the CLC meeting on May 11 and again at the Splashing Task Force meeting last week.

*(for) William J. Sushon*  
William J. Sushon  
AT&T External Affairs

*Amy B. Lewis*  
Amy B. Lewis  
AT&T Consumer Markets



195 North Maple Avenue  
Basking Ridge, N.J. 07920

May 24, 1989

AT&T offers these comments on the final report written by the Splashing Task Force as a way of clarifying several key points on which there was no consensus or on which there is a lack of clarity.

AT&T strongly agrees that the Elimination of Call Blocking at all locations will lead to a complete solution to splashing and other problems currently existing in the operator services marketplace. AT&T recognizes that there are technical considerations such as the availability of 1-0-XXX-1- blocking, the availability of appropriate line screening, and the cooperation of OSPs, equipment manufacturers and aggregators, which must be resolved prior to a total solution; however, various steps can be taken today. The responsibility for unblocking should be shared by all participants in the industry, not just by AT&T. AOS providers and traffic aggregators, in particular, must be willing to employ the technology available in the business they have recently entered and be prepared to share in the cost required to rectify problems.

AT&T also supports the conclusion that there are four other potential solutions which alone or in combination will significantly reduce splashing.\* AT&T also agrees that two solutions, Call Reorigination at LEC Switches and OSP Subcontract are not feasible for the reasons clearly indicated in the report. For the reasons set forth below, AT&T does not agree with certain AOS providers who advocated the remaining four solutions and feels that the discussions included in the description of the negatives associated with each speak for themselves.

\* Until any solution to splashing is implemented, as an interim measure, an AOS should turn customers back when it is unable to process a call or, at a minimum, inform customers that they are being "splashed" to AT&T and therefore may be billed from a location other than where the customer is actually placing the call.

While AT&T has willingly participated in the Splashing Task Force, it should not be viewed as the sole carrier to resolve problems which it has not caused. Although included in the Report are many of AT&T's estimates of time, cost, and difficulty of implementation associated with various proposed solutions, they should not apply to AT&T alone. Rather, all proposed solutions should be applied equally throughout the industry.\*\*

Moreover, four of the possible "solutions" supported by AOS providers are simply not feasible at this time or in the near future.

(a) Call Transfer With Signalled ANI: This "solution" would be virtually impossible to implement due to significant limitations within the AT&T network. Even if AT&T's systems could be modified, there is presently no quantification of how long it would take nor how much it would cost for all other operator services providers, including AOS providers, MCI, Sprint, etc. to make arrangements to transfer calls using dedicated trunk groups. Additionally, the technical configuration of such an arrangement could result in potential transmission degradation which is clearly detrimental to the end-user and at cross purposes with FCC objectives.

(b) Call Transfer with Call Detail: This "solution" creates a similar situation as in Call Transfer with Signalled ANI and cannot be implemented because of the technical limitations described in the report.

(c) Call Transfer with Oral ANI: Having an operator orally recite call information to an operator at a competing company would be a giant step backwards in an industry which is becoming quickly automated and customer-friendly. The potential fraud problems associated with trusting a competing carrier to provide accurate data further adds to the infeasibility of this "solution."

(d) Establishment of 800/950 Access by OSPs/EXCs: This "solution" poses significant service, time, and cost considerations which cannot justify its use. AT&T could in the short-term supply such a service only without originating

\*\* While recently the operator services marketplace has been viewed as being comprised of AT&T and AOS providers, several of the OCCs (e.g. Sprint and MCI) may be providing operator services to customers from transient locations and may be splashing calls to AT&T, further exacerbating an already difficult problem.

ANI information and therefore customers would only be able to presently make 0- calls, again, a significant step backward in an industry which has quickly become highly automated. The developmental cost is substantial, with an estimated \$20-50 million in costs just to AT&T. No estimate was included for any IXC/OSP currently lacking an 800 or 950 access method. In addition, there would be significant operational expense to AT&T associated with this solution.

**SWIDLER & BERLIN**

CHARTERED  
1000 K STREET, N.W.  
SUITE 300  
WASHINGTON, D.C. 20007-4091  
944-1900

RUSSELL M. BLAU  
ATTORNEY-AT-LAW

DIRECT DIAL  
(202) 944-4899  
TELEX 701131  
TELESCOPE (202) 944-4290

VIA FACSIMILE

M E M O R A N D U M

TO: Darryl Brown  
FROM: Russell M. Blau  
DATE: May 24, 1989  
RE: Report on Call Splashing

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Attached are the Comments of Operator Assistance Network concerning the Call Splashing Task Force Report. We understand that these comments will be attached to the report sent to the FCC.

Please call me if you have any questions or if there are any problems with the facsimile transmission.

cc: Harvey Berg (w/enc.)

### COMMENTS OF OPERATOR ASSISTANCE NETWORK

Operator Assistance Network ("OAN") has actively participated in the Call Splashing Task Force on behalf of the more than 30 CSPs for whom OAN acts as a billing and collection intermediary. Although the Task Force has made a useful first step towards identifying possible solutions to call splashing, OAN cannot concur with the Conclusions section of the Task Force Report. The "partial solutions" recommended by the Task Force are inadequate to resolve the issues referred to the Task Force by the FCC.

OAN believes that solutions to the splashing and blocking issues can only be achieved through the cooperative efforts of the communications industry, LECs, IXCs, CSPs, aggregators and manufacturers. We also believe that dominant and bottleneck service providers have an equal if not added obligation to support solutions that assist their competitors and/or customers in resolving the twin problems of splashing and blocking. Failure to respond favorably to the challenge will likely result in a return to the earlier monopoly environment.

OAN must note its dissatisfaction with the Report's failure to explain either the basis for its conclusions or the impact of its proposals. Although the Report sets forth advantages and disadvantages of each of eleven potential solutions in detail, it fails entirely to explain the process by which these factors were weighed and compared to result in the

selection of some proposals and the rejection of others. The FCC is therefore denied the opportunity to review the Task Force's decisionmaking process and cannot use this report as a basis for formulating policy. Administrative agencies must provide a reasoned explanation of the basis for their decisions. The Commission clearly cannot rely on a report that purports to propose "solutions" without any explanation of the basis for their selection.

Before discussing specific proposals, OAN is compelled to note that the various proposed solutions discussed in the Report are interdependent, and cannot be implemented in a vacuum. For example, Consumer education (#4) without concurrent or earlier implementation of 800/950 access (#7) could have the adverse impact of increasing the number of calls splashed and thereby exacerbating the problem instead of correcting it. Determination of the interrelationships of proposed solutions along with the implicit cost/benefit analysis referred to in the Report is required prior to a final determination of the solutions to be adopted and the sequence of implementation.

#### The Best Solutions to the Problem

In order to correct splashing and provide consumer satisfaction, OSPs need the ability to correctly bill calls, correctly transfer calls, and/or tell callers how to reach AT&T, when access to AT&T is not directly available.



(1) Billing

All LECs should provide unbundled, nondiscriminatory, reasonably priced billing and collection services to all OSPs. In addition, they should provide billing validation data and/or services on similar non-discriminatory prices, terms and conditions.

(2) Call Transfer

AT&T should accept the call detail information necessary to bill correctly all calls that are transferred to them. OSPs have proposed at least three different methods for accomplishing this goal. All of these remedies have been proposed to AT&T and rejected; it would seem that at least one of these methods should form the basis for an acceptable compromise solution.

(3) Alternative Access

Because of AT&T's exclusive reliance on 10XXX access, there are phones from which direct access is unavailable due to concerns regarding fraud. The industry is working together to unblock and/or gain alternative access methods from all phones. However, it must be noted that MCI, US Sprint, Allnet and other IXCs have avoided the problems inherent to 10XXX alternative access by providing 800 and 950 access to their operators.

The developments necessary to implement universal 10XXX access without undue risk of fraud include the implementation of Equal Access in all LEC end offices, the development of toll fraud prevention capabilities, enhanced originating and

terminating line screening, and CPE, as well as OSP, hardware and software modifications. Until such time as full 10XXX access is available, or AT&T makes additional access methods possible, OSPs will have no choice but to transfer those callers who request AT&T to AT&T.

#### Conclusion

The Task Force should request that the FCC order independent LECs to make billing and collection services and billing validation data and services available to all OSPs on unbundled, non-discriminatory, and reasonably priced terms and conditions. The FCC should require AT&T to accept and correctly bill calls being transferred to them by other OSPs; OSPs are more than willing to work with AT&T in determining the best method for accomplishing this objective. The industry should work towards a universal unblocking of all alternative access methods available at all phones. This will require full LEC Equal Access, CPE, and OSP hardware and software development, and expanded II digit capabilities. In the meantime, AT&T should provide additional alternative access methods, instead of relying solely on 10XXX access.

May 24, 1989

Mr. George Edwards  
Chairman  
Carrier Liaison Committee  
Exchange Standards Association  
5430 Grosvenor Lane, Suite 200  
Bethesda, Maryland 20814

Re: Comments on the Call Splashing Task Force Report

Dear Mr. Edwards:

The undersigned parties are operator service providers ("OSPs") or representatives of the competitive operator services industry that participated at the Call Splashing Task Force meetings leading up to its Report on Call Splashing finalized on May 19, 1989 ("Report"). This letter will serve to convey additional facts and conclusions which were excluded from the Report. It is our intention to focus on the primary causes of call splashing and to provide a constructive, unified solution to the problem.

The Principal Causes of the Problem

There are two major causes of call splashing. The first reason is that OSPs have been unable to obtain billing and collection agreements and billing validation data from the vast majority of local exchange telephone companies ("LECs"), and, accordingly, are unable to bill calls charged to lines in these areas.

The second major cause for call splashing is that consumers ask to be transferred to AT&T. AT&T has provoked this action by placing numerous television, radio, and print advertisements, including advertisement of a toll-free assistance number where callers receive instructions telling them to request transfer to an AT&T operator when calling from institutional locations and payphones that are not served by AT&T. These practices significantly contribute to call splashing. Moreover, because AT&T has refused to use any access method other than 10XXX dialing (only available from Equal Access converted end-offices), many consumers have no choice but to request a transfer from the serving operator service company.

### The Best Solutions to the Problems

In order to rectify this problem and provide consumer satisfaction, OSPs need the ability to bill calls correctly, validate billing methods, and transfer calls properly so that erroneous billing is avoided. Furthermore, consumers need a reasonable form of access to alternative carriers (i.e., 950-XXXX or 1-800), including AT&T.

#### 1) Billing, Collection and Validation

As reflected in the Report, there was a consensus at the Task Force meetings that billing and validation are important elements in resolving the splashing problem.<sup>1</sup> The LECs should provide unbundled, non-discriminatory, and reasonably priced billing and collection services to all OSPs. In addition, they should provide billing validation data and/or services on similar non-discriminatory prices, terms and conditions.

#### 2) Call Transfer

As stated in the Report, there was disagreement among participants at the Task Force meetings over call transfer arrangements.<sup>2</sup> It is our position that the problem of incorrect billing associated with splashed calls could be avoided if AT&T accepted the call detail information necessary to bill correctly all transferred calls. The OSPs have proposed at least three different methods for accomplishing this goal. First, the information could be signalled to AT&T along with the actual transferred call. Second, the information could be provided orally by the connecting operator. Third, the call detail record could be passed in any compatible format to AT&T, subsequent to the handling of the call. All of these remedies are identified in the Report and have been rejected by AT&T.

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<sup>1</sup> In addition, the Report states that the Task Force agreed that call reorigination at CPE is used by some OSPs as an alternative to call splashing but it is not necessarily a feasible solution to the problem of call splashing for all OSPs. As noted in the Report, reorigination at CPE through automatic dialers has several drawbacks for OSPs. In addition to the negatives mentioned in the Report, automatic redialers are not cost effective for many private payphone operators and they are not compatible with all CPE. Some OSPs are, in fact, starting to phase out their use of dialers for these reasons.

<sup>2</sup> See Report, Potential Solutions 2, 3 and 11.

The OSPs also disagree with AT&T's characterization of call transfer arrangements as "forced partnering." In fact, the concept is nothing more than the reasonable interconnection required under the Communications Act.

### 3) Alternative Access

AT&T relies exclusively on 10XXX dialing as the only alternative means by which its network can be accessed, even though it recognizes that there are telephones for which that access method is unavailable. The industry is working together to unblock and/or facilitate alternative access methods from all telephones. It must be noted, however, that interexchange carriers other than AT&T have avoided the problems inherent to 10XXX alternative access by providing 800 and 950 access to their operators. Additionally, 10XXX unblocking in the dial 0 market should be accompanied by non-discriminatory equal access to all information provided by LECs to AT&T.

In order to implement 10XXX access fully, there must be full deployment of equal access in all LEC end offices, the development of toll fraud prevention capabilities, complete originating and terminating line screening, expanded information (II) digit capability, and CPE hardware and software modifications. Until such time as full 10XXX access is available, or AT&T makes additional access methods possible, OSPs will have no choice but to transfer at least some calls to AT&T.

### Conclusion

As a solution to splashing, we are requesting that the FCC require independent local exchange companies to make billing and collection services and billing validation data and services available to all OSPs on unbundled, non-discriminatory and reasonably priced terms and conditions. In addition, the FCC should require AT&T to accept and correctly bill all calls transferred by other OSPs. The OSPs are more than willing to work with AT&T in determining the best method for accomplishing this objective.

As the Commission is aware, the implementation of 10XXX access will require full LEC equal access, CPE hardware and software development, and complete line screening capability, the achievement of which will take years.<sup>3</sup> The Commission

should not allow these complex issues to impede the implementation of the presently available solutions to the splashing problem. AT&T should provide additional alternative access methods, such as an 800 number, and accept the call detail information necessary to bill correctly the calls transferred to it by OSPs. This will provide AT&T's subscribers with the access they seek without unnecessarily exposing others to risks of fraud and competing carriers to inferior access arrangements in the dial 0 market.

Respectfully submitted,

Danny E. Adams

Danny E. Adams, Counsel for  
Operator Service Providers  
of America

Helen M. Pohl

Helen M. Pohl, 1/3/89  
General Counsel  
Competitive Telecommunications  
Association (COMPTEL)

Mary Kelsey

Mary Kelsey  
Call America

Robert Rowland

Robert Rowland  
Capital Network  
System, Inc.

Diane Harbaugh

Diane Harbaugh  
International Telecharge  
Inc.

D. James Hudson

D. James Hudson  
Integretel Inc.

Richard J. Gibbs

Richard J. Gibbs  
LD/USA

Brad Mutchelknaus

Brad Mutchelknaus  
George Vinall  
National Telephone Services,  
Inc.

3 (...continued)

involved in unblocking 10XXX access at some CPE and payphones in the context of limited waivers filed by four OSPs. See Public Notice, DA 89-480, released April 27, 1989 (requesting comments on Petitions for Waiver of limited portions of the call blocking prohibition).

Phil Sundberg *by JF*  
Phil Sundberg  
NYCOM

Joseph Sharkey *by JF*  
Joseph Sharkey  
Operator Assistance Network

Arnold Gilbert *by JF*  
Arnold Gilbert  
Payline Systems, Inc.

Brad Young *by JF*  
Brad Young  
U.S. Sprint Communications  
Company

George Hays *by JF*  
George Hays  
U.S. Sprint Services  
Company

Tom Osterland *by JF*  
Tom Osterland  
Teleconnect\*USA

Greg Casey *by JF*  
Greg Casey  
Jack Pace  
Telesphere Network, Inc.

Myra Ramsey *by JF*  
Myra Ramsey  
US Long Distance, Inc.

Douglas Brent *by JF*  
Douglas Brent  
American Network Exchange  
Inc.



MCI Telecommunications  
Corporation

1133 19th Street, NW  
Washington, DC 20036  
202 872 1600

May 25, 1989

Mr. George Edwards  
Chairman  
Carrier Liaison Committee  
5430 Grovsnor Lane, Suite 200  
Bethesda, Maryland 20814

Dear Mr. Edwards:

I am writing to you to provide MCI's comments to the Carrier Liaison Committee's (CLC's) "Operator Service Splashing Task Force" report to the FCC. I would like to thank you and the CLC for adopting the procedure for attaching individual company comments and views to the report. In the future this should help abate many of the major dissension that has existed in the forums when other reports did not contain all views.

#### Overview

MCI fully supports the philosophy that callers should be able to reach the carrier of their choice via the use of carrier access codes (950, 800 and 10XXX). This access method provides callers with universal access to the carrier of their choice.

At this time AT&T has not made universal access readily available to their customers. As a result we may be required to transfer calls to AT&T even though, we have not engaged in this practice in the past. Our policy will be for the MCI operator to instruct the caller to redial to reach the carrier of their choice, unless prohibited by state regulation or required to meet special customer needs. In such instances, MCI is willing to have its operators pass automatic number identification (ANI) when transferring calls to the receiving operator service provider<sup>1</sup> to enable correct billing of such calls. However, if the receiving operator services provider is unwilling to accept the ANI, then we will be forced to splash such calls.

Of all of the recommendations, the most promising near term solution is the "oral transfer of ANI." MCI is willing to institute the associated manual processes in situations where our operators would transfer calls with oral ANI to enable correct billing. For the long term, MCI recommends that every carrier establish universal access via 800/950/10XXX access codes. The 800/950 access method may be preferable for the hospitality industry because it does not impose requirements on hotels, hospitals, universities, and other institution to replace or upgrade existing equipment.

<sup>1</sup>AT&T is the only operator service provider that has been identified



MCI has the following observations regarding the options considered by the task force:

#### Eliminate Call Blocking

While this would be the best long term solution, the time frames, as noted in the task force report, are not certain. The task force did not have all of the information regarding customer provided equipment capabilities available to fully assess the capability of screening and routing of 10XXX + 0 and blocking of 10XXX + 1 calls. MCI concurs with the task force report that this is only a partial solution in the near term. The overview of these comments provides additional details on this solution.

#### Call Transfer With Signalled ANI

The development costs and timelines associated with this solution are not desirable. MCI concurs with the task force report that this is not feasible.

#### Call Transfer With Oral ANI

MCI's opinion is that transferring calls and passing oral ANI to the receiving operator service provider is the best case near term solution. We realize that there may be instances where human errors could occur, but such cases should be manageable to a minimum level. This solution would require the transferring operator service provider to incur access charges, plant overhead, and operator handling time. This should be compensated by the receiving operator service provider that is receiving the revenue for such calls.

#### LEC Billing, Collection and Validation Agreements

MCI agrees that LEC billing, collection and validation agreements should be available to all operator service providers with reasonable terms and conditions.

#### Call Reorigination At CPE

Reorigination cannot be feasibly accomplished and is not in the consumers best interest. The consumer would be subjected to hearing the reoriginated dialed address sequence tones, which can be at very high irritating levels.

#### Call Reorigination At LEC Switches

This method is cost prohibitive and would require the operator service provided to have a point of presence in every LATA. Further, the time frames for this approach are excessively long to consider it viable.